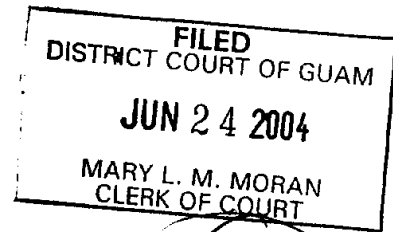


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Attorneys for plaintiff



DISTRICT COURT OF GUAM

TONKO REYES, INC.,)	Civil Case No.04-0016
)	
Plaintiff,)	
)	
vs.)	PROPOSED
)	DISCOVERY PLAN
)	
LLOYDS OF LONDON,)	
)	
Defendant.)	
_____)	

The parties submit the following proposed discovery plan herein, as required by Rule 26(f) of the Federal Rules of Civil Procedure and this Court's Local Rule 16.1(d).

1. Disclosures: The parties see no need for changes in the timing, form or requirement for disclosures under Rule 26(a) of the Federal Rules of Civil Procedure or this Court's Local Rule 26.2. Plaintiff shall make its initial disclosures required by said rules no late than June 30, 2004. Defendant shall make its initial disclosures no late than July 7, 2004. Rule 26(a)3) disclosures shall be made no later than 30 days before trial.

2. Discovery Subjects and Timing: Plaintiff desires to conduct discovery as to defendant's denial of liability and denial

of damages. Defendant desires to conduct discovery as to the basis for and the amount of plaintiff's claimed damages herein.

Discovery should be completed no later than 30 days before trial. As the issues of liability and damages in this case are relatively straightforward, the parties see no need to limit discovery, or to conduct discovery in phases.

3. Limitations on Discovery: The parties see no need for changing any of the limitations on discovery set forth in the Federal Rules of Civil Procedure or this Court's Local Rules, or for imposing any other limitations.

4. Other Orders: The parties see no need for other orders under Rules 16(b), 16(c) or 26(c) at this time.

5. Expert Witnesses: Disclosure of expert testimony under Rule 26(a)(2) of the Federal Rules of Civil Procedure shall be made not later than 90 days prior to trial. Rebuttal expert reports shall be exchanged no later than 60 days prior to trial. Expert witness depositions, including those of rebuttal expert witnesses shall be completed no later than the discovery completion date.

Respectfully submitted,

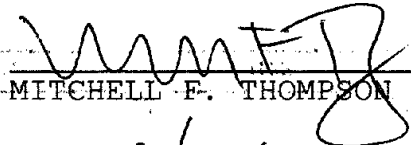
MAHER & THOMPSON, P.C.

CARLSMITH BALL

Attorneys for Plaintiff

Attorneys for Defendant

By:


MITCHELL F. THOMPSON

By:


DAVID LEDGER

Dated:

6/4/04

Dated:

June 7, 2004

RECEIVED

JUN 08 2004

DISTRICT COURT OF GUAM
HAGATNA, GUAM